

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MINNESOTA**

CRAIG PARMER and MARK A. LAURANCE individually and on behalf of all others similarly situated,

Plaintiffs,

v.

LAND O’LAKES, INC., THE BOARD OF DIRECTORS OF LAND O’LAKES, INC., LAND O’LAKES, INC. RETIREMENT PLAN COMMITTEE, and JOHN DOES 1-30.

Defendants.

Case No. 0:20-cv-01253-DSD-HB

**PLAINTIFFS CRAIG PARMER AND MARK A. LAURANCE’S UNOPPOSED MOTION  
FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT,  
PRELIMINARY CERTIFICATION OF SETTLEMENT CLASS, APPROVAL OF  
CLASS NOTICE, APPROVAL OF PLAN OF ALLOCATION,  
AND SCHEDULING OF A FAIRNESS HEARING**

Plaintiffs Craig Parmer and Mark A. Laurance (collectively, “Plaintiffs”), participants in the Land O’Lakes Employee Savings & Supplemental Retirement Plan (the “Plan”), respectfully submit this Unopposed Motion for Preliminary Approval of Class Action Settlement Agreement entered into with Defendants<sup>1</sup> (the “Settlement” or “Settlement Agreement), Preliminary Approval of Class Notice, Approval of Plan of Allocation, and Scheduling of a Fairness Hearing (“Motion for Preliminary Approval) and respectfully move this Court for an Order granting the relief sought. The grounds for this motion are set forth in Plaintiffs’ and their Counsel’s declarations and the memorandum of law in support of this motion, which are submitted herewith.

<sup>1</sup> “Defendants” refers, collectively, to Land O’Lakes, Inc. (“Land O’Lakes”), The Board of Directors of Land O’Lakes, Inc. (the “Board”), and the Land O’Lakes, Inc. Retirement Plan Committee (the “Committee”).

A Proposed Order is submitted herewith.

Dated: February 28, 2022

Respectfully submitted,

**CAPOZZI ADLER, P.C.**

/s/ Mark K. Gyandoh

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**CERTIFICATE OF SERVICE**

I hereby certify that on February 28, 2022, a true and correct copy of the foregoing document was filed with the Court utilizing its ECF system, which will send notice of such filing to all counsel of record.

By: Mark K. Gyandoh  
Mark K. Gyandoh, Esq.